

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION**

**NO. 5:20-CV-00701**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>COMPLAINT FOR</b>
	)	<b>FORFEITURE <i>IN REM</i></b>
<b>\$66,015.00 IN U. S. CURRENCY,</b>	)	
	)	
<b>Defendant.</b>	)	

The United States of America, by and through the United States Attorney for the Eastern District of North Carolina, states as follows:

1. This is a civil action *in rem* brought to enforce the provisions of 18 U.S.C. § 981(a)(1)(C) providing for the forfeiture of property which constitutes or is derived from proceeds traceable to any offense constituting “specified unlawful activity” as defined in 18 U.S.C. §§ 1956(c)(7) and 1961(1) or a conspiracy to commit such offense, including trafficking in contraband cigarettes in violation of 18 U.S.C. § 2342(a).

2. This Court has subject matter jurisdiction over this matter by virtue of 28 U.S.C. §§ 1345 and 1355(a). The Court has *in rem* jurisdiction by virtue of 28 U.S.C. § 1355(b). Venue in this district is proper by virtue of 28 U.S.C. § 1395(b).

3. The defendant is \$66,015.00 in United States Currency.

4. The defendant was seized from Mazen Manaei on July 29, 2020, in Granville County, North Carolina. Custody of the defendant was transferred by the

Granville County Sheriff's Office to the Department of Homeland Security, and the defendant is currently located in the Seized Asset Deposit Fund Account maintained by U.S. Customs and Border Protection, within the jurisdiction of this Court.

5. The potential claimants in this action are Mazen Manaei and Mohamad Ghalayini.

6. The facts and circumstances supporting the seizure and forfeiture of the defendant are contained in Exhibit A, Declaration of Heidi Bridges, Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), which is attached hereto and incorporated herein by reference. Such facts constitute probable cause for the seizure, arrest, and forfeiture of the defendant property and are sufficient to support a reasonable belief that the government will meet its burden of proof at trial that the defendant property should be forfeited.

7. The defendant constitutes or was derived from proceeds traceable to an offense constituting a specified unlawful activity as defined in 18 U.S.C. §§ 1956(c)(7) and 1961(1) or a conspiracy to commit such offense, including trafficking in contraband cigarettes in violation of 18 U.S.C. § 2341, and is therefore forfeitable to the United States of America pursuant to 18 U.S.C. § 981(a)(1)(C).

WHEREFORE, in accordance with Supplemental Rule G(3)(b)(i), the plaintiff requests that the Clerk issue a warrant of arrest *in rem* for the defendant; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the defendant be forfeited to the

United States of America for disposition according to law; and that the United States of America be granted such other relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted this 29<sup>th</sup> day of December, 2020.

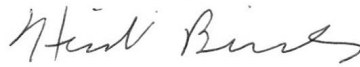
ROBERT J. HIGDON, JR.  
United States Attorney

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## VERIFICATION

I, Heidi Bridges, Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HIS), declare under penalty of perjury, as provided by 28 U.S.C. § 1746, that the foregoing Complaint for Forfeiture is based on reports and information known and/or furnished to me and to the best of my information and belief, is true and correct.

This the 29 day of December, 2020.



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Heidi Bridges  
Special Agent  
Homeland Security Investigations